

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF RACQUEL KELLEY

I, Racquel Kelley, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today.

Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the Pentagon when American Airlines Flight 77, hijacked and piloted by terrorists, plunged into the West wall of the Pentagon and tore through the building. At the time of these terrorist attacks, I worked as an Information Technology Specialist intern for the United States Army's Information Management Support Center (IMCEN).

4. The collision of Flight 77 into the building caused destruction, mayhem, and unspeakable carnage that would endure for several hours without pause. These horrific memories will now last a lifetime for survivors like myself.

5. At the time of Flight 77's impact with the Pentagon, I had been working on my daily IT assignments with my coworkers in my office (located in section 1D520). Suddenly, I heard an incredibly loud explosion, and the room quickly filled with smoke, building debris, jet fuel, and

fire. I had been located only seven hundred feet from the passenger jet's point of impact with the exterior wall of the Pentagon.

6. The force of the blast caused me to lose consciousness, and I woke up a short time later with my clothes on fire and my office filled with smoke, fire, and building debris. My office had essentially been destroyed by the force of the impact.

7. As a result of the blast, I received burns to both of my hands and my feet. I further inhaled large quantities of debris and smoke into my lungs and airways, and I had great difficulty breathing. I had become surrounded by a large cloud of dust and debris, and I had been partially buried by the remnants of my office. I had zero visibility.

8. I tried to crawl under the remnants of my office desk, and as I moved, building debris began to fall on me from above. I noticed that my shoes had been severely burned and they were actually stuck to my feet.

9. My coworkers, Janice and Doug, found me under a pile of rubble and pulled me out. They told me that I was in shock. They helped me to my feet and we linked arms. I then followed the voices that were telling everyone in the vicinity where to go to escape the burning building. I had to climb over piles of debris and human body parts as I tried to escape and exit from the building. I actually saw a victim who had been decapitated who was still holding a burned piece of paper as I made my way through the destruction within the Pentagon. The scene looked like a war zone and these horrific images will remain in my memories forever.

10. As I escaped from the building, I stopped breathing due to all of the dust and smoke that I had inhaled. Emergency personnel had to resuscitate me before I left the Pentagon area. Emergency responders then transported me to Washington Hospital Center. I was admitted to the hospital's ICU Burn Unit where I received initial treatment for my burns and other injuries.

11. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: second degree burns to my hands and feet¹; multiple cuts and abrasions to my head, ears, arms, and feet²; serious injuries to my lungs and airways due to the large quantities of debris and toxins that I inhaled, including smoke inhalation³, asthma⁴, wheezing⁵, chest tightness with shortness of breath⁶, bronchitis⁷, respiratory insufficiency⁸, a partially collapsed lung (Bibasal Atelectasis)⁹, and an upper airway injury¹⁰. Lastly, I have been diagnosed with post-traumatic stress disorder¹¹ due to the horrific events that I experienced on 9/11.

12. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of a WTOP News article from September 10, 2021, in which I recounted my experience on 9/11.

13. I previously pursued claims (Claim Number 0131702) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claims were determined to be eligible for compensation.

¹ See, Medical Records of Racquel Kelley (KELLEY_MEDS_000001), attached hereto as Exhibit B, at 0002, 0005-0008, 0011-0012, 0017, and 0018.

² Id. at 0009 and 0012.

³ Id. at 0002, 0004-0009, 0011-0012, 0017, 0019 and 0020.

⁴ Id. at 0002, 0004, 0008, 0019 and 0020.

⁵ Id. at 0002, 0003, and 0007.

⁶ Id. at 0004, 0007, and 0021.

⁷ Id. at 0009.

⁸ Id. at 0009.

⁹ Id. at 0014-0016.

¹⁰ Id. at 0008.

¹¹ Id. at 0002, 0010 and 0013.

I DECLARE, VERIFY, AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 16 day of April 2022.



Declarant Racquel Kelley

**CITIZENSHIP
AND
MEDICAL
EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**

Exhibit C

WTOP News Article

WTOP NEWS

RUSSIA-UKRAINE WAR: Latest updates | Ukrainians defy surrender-or-die demand | Diplomat: Mariupol 'doesn't exist anymore' | Pope makes plea for peace

This article is about **7 months** old

9/11 Pentagon survivor looks back at the attack that almost claimed her life

Mike Murillo | mmurillo@wtop.com

September 10, 2021, 7:33 AM

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Deputy chief of the Army Reserve, Col. Malcolm Bruce Westcott, comforts Pentagon employee Racquel Kelley while giving her medical aid outside the Pentagon in Washington on Tuesday, Sept. 11, 2001. (AP Photo/Will Morris)

Just back to work from maternity leave on the morning of Sept. 11, 2001, Racquel Kelley was on the fence about going in that day, because she was feeling a bit under the weather.

The information specialist from D.C., who was 32 at the time, settled on dropping her 6-month-old son off at day care and reporting to her job at the Pentagon.

At her office, she remembers, co-workers watched a feed of events unfolding in New York City, where a plane had just crashed into one of the World Trade Center towers.

After discussing the events for a moment, Kelly and her co-workers began to take on the day's work.

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That's where her recollection stops abruptly.

It picks up after the crash of American Airlines Flight 77 into the western side of the Pentagon.

"I remember waking up in my chair, with destruction around me. I'm on fire," Kelley said.

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For a moment she looked around for her co-workers and didn't see them.

Kelley was underneath her desk, where she thought of her baby and began to pray. As she prayed, several co-workers who survived were making their way to her, but it was no easy task — Kelley didn't realize she was beneath a pile of rubble.

Co-workers formed a human chain to get her out. She crawled with the others through the debris to escape. As they made their way outside, she recalls being in shock, and seeing things she thought at the time were imaginary.

"What sticks out is a person sitting at their desk, burned with a piece of paper ... they had no head. And I was like, 'How are they going to read that piece of paper if they have no head?'"

Once they made it to the end of the hole inside the Pentagon, the others encouraged her to jump down. Still in a daze and badly hurt, at the time she couldn't comprehend why they had to jump from the first floor of the building.

On the grassy area, she recalls being surrounded by cots with people on them, and Col. Bruce Wescott coming to her aid. He would begin treating her until she could be taken to Washington Hospital Center.

While her memory fades in and out, she remembers concerns spreading about another attack.

"Somehow I kept hearing 'There's another plane' move everybody'" Kelley said



The next thing she recalls is being strapped to the gurney inside a helicopter, and paramedic Barbara Brown speaking with her and intubating her on the way to the hospital. She was the first to be airlifted to the hospital, since she had severe burns and was suffering from smoke inhalation.

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Her memory then flashes forward five days, when she woke up at the hospital.

It was a long road to recovery, but she credits the hospital for saving her life for the second time — the first being when she was born four months early at MedStar Washington Hospital Center.

Twenty years later, Kelley said, many of the physical wounds have healed, but she continues to suffer from post-traumatic stress disorder. To this day, she is awakened by nightmares that flash her back to the frightening sight and sounds from that day.

"It's like a movie reel that plays over and over again, in my head," she said.

Therapy and yearly retreats with other 9/11 survivors have helped her cope and spot triggers, but she admits she still has a long way to go.

"Even 20 years later, I am still learning to deal with them," she said.

She said she is forever thankful for the people who that day, and in the days following, helped save her life.

"I was in the 'wrong' right place at the right time," she said.

Now 52, Kelley said she's thankful to have survived. As she looks at the world today, Kelley frequently thinks back to the nation's sense of unity in the months and years following.

"We had each other's back; we were everybody's brothers and sisters; we loved each other. We were hugging. And I wish we could get back to that spirit, that feeling," she said.

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